

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

VIACOM INTERNATIONAL INC.,
COMEDY PARTNERS,
COUNTRY MUSIC TELEVISION, INC.,
PARAMOUNT PICTURES CORPORATION,
and BLACK ENTERTAINMENT TELEVISION
LLC,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC, and
GOOGLE INC.,

Defendants.

Civil Action No. 07-CV-2103
Judge Stanton

ECF CASE

**NOTICE OF JOINT MOTION
TO COMPEL**

THE FOOTBALL ASSOCIATION PREMIER
LEAGUE LIMITED, BOURNE CO. (together
with its affiliate MURBO MUSIC PUBLISHING,
INC.), CHERRY LANE MUSIC PUBLISHING
COMPANY, INC., CAL IV ENTERTAINMENT
LLC, ROBERT TUR d/b/a LOS ANGELES
NEWS SERVICE, NATIONAL MUSIC
PUBLISHERS ASSOCIATION, THE RODGERS
& HAMMERSTEIN ORGANIZATION, STAGE
THREE MUSIC (US), INC., EDWARD B.
MARKS MUSIC COMPANY, FREDDY
BIENSTOCK MUSIC COMPANY d/b/a
BIENSTOCK PUBLISHING COMPANY,
ALLEY MUSIC CORPORATION, X-RAY DOG
MUSIC, INC., FEDERATION FRANCAISE DE
TENNIS, THE SCOTTISH PREMIER LEAGUE
LIMITED, THE MUSIC FORCE MEDIA
GROUP LLC, THE MUSIC FORCE LLC, and
SINDROME RECORDS, LTD. on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC and
GOOGLE, INC.,

Defendants.

Civil Action No. 07-CV-3582
Judge Stanton

ECF CASE

PLEASE TAKE NOTICE that, the Plaintiffs in the matter of *The Football Association Premier League Ltd. and Bourne Co., et. al., on behalf of themselves and all other similarly situated, v. YouTube. Inc., et. al.*, Civil File No. 07-CV-3582 (LLS) and the Plaintiffs in the matter of *Viacom International Inc., et. al., v. YouTube Inc., et. al.*, Civil File No. 07-CV-2103 (LLS), by their respective undersigned attorneys, hereby jointly move this Court, before the Honorable Louis L. Stanton, United States District Judge, at the United States District Court, Southern District of New York, located at 500 Pearl Street, Courtroom 21C, New York, New York, as soon as the matter may be heard, or as otherwise agreed to by counsel and so ordered by the Court, for an Order granting their Motion to Compel Defendants' production of certain electronically stored information and documents and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon the accompanying sealed Memorandum of Law in Support of Plaintiffs' Joint Motion to Compel, dated February 8, 2008, and the appendix annexed thereto, and upon the accompanying sealed Declaration of Susan J. Kohlmann dated February 8, 2008, and the exhibits annexed thereto, and upon all prior papers and proceedings in this action.

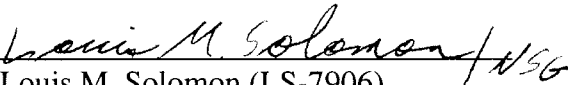
Dated: February 8, 2008
New York, New York

By: Donald B. Verrilli, Jr. *for* *one*
Donald B. Verrilli, Jr. (DV-2252)
William M. Hohengarten (WH-5233)
Scott B. Wilkens (*pro hac vice*)
Ginger D. Anders (GA-1178)
JENNER & BLOCK LLP
601 Thirteenth Street, N.W.
Suite 1200 South
Washington, DC 20005-3823
Telephone: (202) 639-6000
Facsimile: (202) 639-6066
Email: Dverrilli@jenner.com

Susan J. Kohlmann (SK-1855)
JENNER & BLOCK LLP
919 Third Avenue, 37th Floor
New York, NY 10022-3908
Telephone: (212) 891-1600
Facsimile: (212) 891-1699
Email: skohlmann@jenner.com

Stuart J. Baskin (SB-9936)
John Gueli (JG-8427)
Kirsten Nelson Cunha (KN-0283)
SHERMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022
Telephone (212) 848-4000
Facsimile (212) 848-7179
Email: sbaskin@shearman.com

*Attorneys for Viacom International Inc., Comedy
Partners, Country Music Television, Inc., Paramount
Pictures Corporation, and Black Entertainment
Television, LLC*

By: 
Louis M. Solomon (LS-7906)
William M. Hart (WH-1604)
Hal S. Shaftel (HS-0627)
Noah Siskind Gitterman (NG-0106)
PROSKAUER ROSE LLP
1585 Broadway
New York, NY 10036-8299
Telephone: (212) 969-3000
Facsimile: (212) 969-2900
Email: lsolomon@proskauer.com

John P. Coffey (JC-3832)
John C. Browne (JB-0391)
Eric T. Kanefsky (EK-3511)
BERNSTEIN LITOWITZ BERGER &
GROSSMAN LLP
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
Email: sean@blbglaw.com

Attorneys for Lead Plaintiffs The Football Association Premier League Limited and Bourne Co., Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, and The Scottish Premier League Limited, and the Prospective Class

Daniel Girard
Aaron Sheanin
Christina H. Connolly
GIRARD GIBBS LLP
601 California Street, 14th Floor
San Francisco, CA 94108

-and-

Gerald E. Martin
Laurel Johnston
BARRETT JOHNSTON & PARSLEY
217 Second Avenue North
Nashville, TN 37201

-and-

Kevin Doherty
BURR & FORMAN
700 Two American Center
3102 West End Avenue
Nashville, TN 37203

Attorneys for Cal IV Entertainment LLC

David S. Stellings
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
780 Third Avenue, 48th Floor
New York, NY 10017-2024
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

-and-

James E. Hough

MORRISON & FOERSTER
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8158
Facsimile: (212) 468-7900

*Attorneys for the National Music Publishers'
Association, Rodgers & Hammerstein Organization,
Stage Three Music (US), Inc., Edward B. Marks
Music Company, Freddy Bienstock Music Company
d/b/a Bienstock Publishing Company, and Alley
Music Corporation.*

Christopher Lovell (CL 2595)
Christopher M. McGrath (CM-4983)
LOVELL STEWART HALEBIAN LLP
500 Fifth Avenue, 58th Floor
New York, New York 10110
Telephone: (212) 608-1900 Facsimile: (212)
719-4677

-and-

Jeffrey L. Graubart (JG-1338)
LAW OFFICES OF JEFFREY L.
GRAUBART
350 West Colorado Boulevard, Suite 200
Pasadena, California 91105-1855
Telephone: (626) 304-2800
Facsimile: (626) 304-2807

-and-

Steve D'Onofrio (SD-8794)
5335 Wisconsin Avenue, N.W. Suite 950
Washington, D.C. 20015
Telephone: (202) 686-2872
Facsimile: (202) 686-2875

*Attorneys for The Music Force Media Group LLC,
The Music Force LLC, and Sin-Drome Records, Ltd.*

TO:

Attorneys for YouTube, Inc., YouTube, LLC and Google Inc.

Richard Ben-Veniste
Andrew H. Schapiro
A. John P. Mancini
MAYER BROWN LLP
1675 Broadway
New York, NY 10019
Telephone: (212) 506-2500
Facsimile: (212) 262-1910
- and -

David H. Kramer
Maura L. Rees
Michael H. Rubin
Bart E. Volkmer
WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION
650 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 493 9300
Facsimile: (650) 493-6811

CERTIFICATE OF SERVICE

I, Susan J. Kohlmann, hereby certify that on February 8, 2008 I served the foregoing **Notice of Joint Motion to Compel** upon all counsel in this action action via e-mail.

Respectfully submitted,

**Viacom International Inc., Comedy Partners,
Country Music Television, Inc., Paramount
Pictures Corporation, and Black Entertainment
Television LLC**

s/ Susan J. Kohlmann

Attorney for Plaintiffs.